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4	UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE	
5		No. 2:20-cv-00424-JHC
6	DEBORAH FRAME-WILSON, <i>et al.</i> , on behalf of themselves and all other similarly situated,	
7	Plaintiffs,	STIPULATED MOTION AND ORDER REGARDING SEALING OF PLAINTIFFS' MOTION TO
8	v.	COMPEL AMAZON TO PRODUCE DOCUMENTS AND
9	AMAZON.COM, INC., a Delaware corporation,	INFORMATION RESPONSIVE TO PLAINTIFFS' SEVENTH SET OF
10	Defendant.	REQUESTS FOR PRODUCTION AND FOURTH SET OF
11		INTERROGATORIES
12		
13 14	ELIZABETH DE COSTER, <i>et al.</i> , on behalf of themselves and all other similarly situated,	No. 2:21-cv-00693-JHC
15	Plaintiffs,	
16	V.	
17	AMAZON.COM, INC., a Delaware corporation,	
18	Defendant.	
19	CUDISTODIED DROWN at al. on behalf of	No. 2:22-cv-00965-JHC
20	CHRISTOPHER BROWN, et al., on behalf of themselves and all others similarly situated,	
21	Plaintiffs,	
22	v.	
23	AMAZON.COM, INC., a Delaware corporation,	
24	Defendant.	
25	Defendant.	
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STIP. MOT. & ORDER RE SEALING OF MTN. TO COMPEL (No. 2:20-cv-00424-JHC; No. 2:21-cv-00693-JHC; No. 2:22-cv-00965-JHC)

The Parties have met and conferred with respect to Plaintiffs' intended Motion to Compel Amazon to Produce Documents and Information Responsive to Plaintiffs' Seventh Set of Requests for Production and Fourth Set of Interrogatories, and anticipate that their briefs, declarations, and exhibits will quote from and/or describe in detail a significant amount of information that has been designated as Confidential or Highly Confidential-Attorneys' Eyes Only by Amazon. Accordingly, in order to ensure that such materials are treated appropriately under the applicable protective order, and to reduce burdens on the Court, the Parties, pursuant to LCR 7(d)(1) and 10(g), and their respective counsel, hereby stipulate and agree to the following procedure for filing and sealing in connection with the motion to compel briefing, subject to the Court's approval.

- 1. Pursuant to LCR 5(g)(2), each Party will provisionally file under seal its brief, declarations, exhibits, and all other evidence on which that Party relies which contain material designated Confidential or Highly Confidential-Attorneys' Eyes Only by Amazon.
- 2. By August 8, pursuant to LCR 5(g), the Parties will meet and confer and, as appropriate, file (1) public versions of their briefs, with necessary redactions, and (2) corresponding motion(s) to seal pursuant to LCR 5(g)(3). The Party seeking to maintain material under seal (or under redaction) shall be the movant for purposes of any such motion(s) to seal associated with the Parties' Papers.

IT IS SO STIPULATED THROUGH COUNSEL OF RECORD.

1	DATED July 3, 2025.	Respectfully submitted,
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19	proposed Class
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IT IS SO ORDERED.

July 3, 2025

Dated 4

John H. Chun

United States District Judge

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